M&B

MOSKOWITZ & BOOK, LLP

Avraham C. Moskowitz
AMoskowitz@mb-llp.com

345 Seventh Avenue, 21st Floor
New York, NY 10001
Phone: (212) 221-7999
Fax: (212) 398-8835

February 10, 2022

VIA ECF
Submitted *Ex Parte* With
Request for Filing Under Seal

Hon. P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Geovanny Fuentas Ramirez
     15 Cr 379 (PKC)

Dear Judge Castel:

Under Seal
The issue presented by the letter of February 10, 2022, I believe, has been resolved. If it has not, Mr. Moskowitz should advise the Court in writing in seven days. The application to file the Feb. 10 letter under seal is GRANTED. Letter motion at #410 is terminated.
SO ORDERED
4-12-23

This letter is respectfully submitted to request authorization, *nunc pro tunc*, for the use of my firm's associate Christopher R. Neff, to assist me in the above captioned case.

I have been a member of the CJA panel in the Southern and Eastern District since I left the U.S. Attorney's Office in 1991. During my entire tenure as a CJA attorney, I have routinely used associates and paralegals to help me represent my court-appointed clients, just as I do on my retained cases. Doing so allows me to give my CJA clients the personal attention they deserve at a cost below that which would be incurred if I provided all the services myself. Moreover, given the numerous pending matters that I handle on a regular basis, the assistance of Mr. Neff was necessary in order for me to handle this matter appropriately and in a timely fashion.

Since 1996, when I started my own firm, I have always employed one or more full-time associates and paralegals. Currently, I employ one-full-time associate. Mr. Neff, who has been working for my firm for approximately seven years, is experienced in handling criminal matters and is highly skilled. He clerked for Judge Batts in the Southern District for two years before joining my firm. Since joining my firm, he has assisted me in representing dozens of clients in criminal matters and has even assisted me in handling a lengthy and complex criminal trial in New York State Supreme Court, New York County